



December 1, 2015

California Building Standards Commission
2525 Natomas Park Drive
Suite 130 Sacramento, CA 95833
Attn: Michael L. Nearman, Acting Executive Director

**PMI Board of
Directors**

**EXECUTIVE
COMMITTEE**

Fernando Fernandez,
TOTO USA
President

Paul Patton, Delta
Faucet Company
Vice-President

Peter Jahrling, Sloan
Valve Company
Treasurer

Tim Kilbane,
Symmons Industries
Immediate Past
President

**DIRECTORS AT
LARGE**

C.J. Lagan, American
Standard Brands

Scott McDonald,
Fluidmaster

Rick Reles,
Kohler Company

Nate Kogler,
Bradley Corporation

RE: PARTICIPATION COMMENTS FOR THE NOTICE DATED NOVEMBER 6, 2015

Dear Mr. Nearman:

Plumbing Manufacturers International (PMI) is an international, U.S.-based trade association representing 90% of plumbing products sold in the United States. It has made the promotion of water efficiency and safety a top priority and has included it in its mission statement.¹ PMI's members are industry leaders in producing safe, reliable and innovative water efficient plumbing technologies and have supported water efficiency legislation and codes in California, as well as the voluntary US EPA WaterSense® program.

PMI supports the actions of the California Building Standards Commission (BSC), Department of Housing and Community Development (HCD) and Division of the State Architect – Structural Safety (DSA-SS) in aligning the plumbing fixture and fitting flow rate requirements for urinals and residential lavatory faucets in the following regulations with those of Title 20:

THE CALIFORNIA BUILDING STANDARDS COMMISSION (BSC):

BSC EF 02/15 – 2013 California Plumbing Code (Part 5, Title 24)

BSC EF 03/15 – 2013 California Green Building Standards Code (Part 11, Title 24)

THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (HCD):

HCD EF 02/15 – 2013 California Plumbing Code (Part 5, Title 24)

HCD EF 03/15 – 2013 California Green Building Standards Code (Part 11, Title 24)

THE DIVISION OF THE STATE ARCHITECT – STRUCTURAL SAFETY (DSA-SS):

DSASS EF 04/15 – 2013 California Plumbing Code (Part 5, Title 24)

DSASS EF 05/15 – 2013 California Green Building Standards Code (Part 11, Title 24)

This alignment will make it easier on retailers, manufacturers, installers and enforcement authorities in ensuring that the proper plumbing products are sold and installed in the State of California in response to the Governor's Executive Order No. B-29-15.

¹PMI's Mission: To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace. To provide a forum for the exchange of information and industry education. To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes. To enhance the plumbing industry's growth and expansion.

PMI would like to thank the California Building Standards Commission for the opportunity to provide comments for the emergency building standards. Our partnership with the regulatory and stakeholder communities in the State of California will continue to promote water efficiency that will produce safe, sanitary, efficient and reliable plumbing products.

Sincerely,

A handwritten signature in black ink, appearing to read 'msigler', with a stylized flourish at the end.

Matt Sigler
Technical Director
Plumbing Manufacturers International
Office 847-217-7212
msigler@safeplumbing.org

Plumbing Manufacturers International | 1921 Rohlwing Road | Unit G | Rolling Meadows, IL 60008
Tel: 847-481-5500 - Visit us at www.safeplumbing.org